

EXHIBIT C

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF FLORIDA

- - - - -X

JASON MILLER, :

Plaintiff, :

vs. : Case No.

GIZMODO MEDIA GROUP, LLC, a : 1:18-cv-24227-CMA

Delaware Corporation, :

KATHERINE KRUEGER, :

individually, and WILL :

MENAKER, individually, :

Defendants. :

- - - - -X

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Videotaped Deposition of JASON MILLER

Washington, D.C.

Wednesday, May 30, 2019

10:11 a.m.

Job No. 271563

Pages: 1 - 372

Reported by: Dana C. Ryan, RPR, CRR

Page

BY MS. BOLGER:

Q Are you going to answer the question?

A I'm going to follow the advice of
counsel.

Q Okay. How did the relationship with --
did you end the relationship with Ms. REDACTED or
did it just stop?

A I -- she called -- she called after the
first Page Six story came out and was -- gave me
an earful, so I'd say if it hadn't formally been
ended, then that was -- I think that's -- I don't
know if that was the last time I spoke with her,
but it was definitely definitively done by that
point.

Q Okay. The first Page Six story you
referred to, that's the Page Six story that said
you went to strip clubs with Ms. Delgado and some
media people; right?

A Correct.

Q And what was the earful that REDACTED
gave you about that story?

A She was wondering if there was a
relationship between me and the other women named
in the story.

Q So she -- REDACTED, your

Page

1 mistress, got mad at you because she thought you
2 were sleeping with A.J. Delgado, your mistress;
3 correct?

4 MR. VOGT: Objection to form.

5 BY MS. BOLGER:

6 Q Is that correct?

7 A Yes.

8 Q Did you ever go to a strip club with
9 Ms. REDACTED?

10 A No.

11 Q What else did she say when she gave you
12 that earful?

13 A I don't recall.

14 Q How long was the conversation?

15 A Pretty brief.

16 Q Did you tell Ms. REDACTED that you were
17 sleeping with Ms. Delgado?

18 A I told her I was not.

19 Q So you lied to Ms. REDACTED about
20 sleeping with Ms. Delgado?

21 A Correct.

22 Q And you lied to your former mistress
23 about sleeping with your current mistress -- your
24 then current mistress; right?

25 MR. VOGT: Objection to form.

Page

1 BY MS. BOLGER:

2 Q Right?

3 A Correct.

4 Q Did Ms. Delgado know about Ms. REDACTED?

5 A No.

6 Q Did you ever sleep with Ms. REDACTED

7 while you were also sleeping with Ms. Delgado?

8 A No.

9 Q How long was the break between sleeping
10 with Ms. REDACTED and sleeping with Ms. Delgado?

11 A I think maybe two months, I believe.

12 Q So other than your affair with
13 REDACTED and other than your affair with
14 Arlene -- sorry.

15 Did anybody know about your
16 relationship with A.J. -- with Ms. REDACTEDr?

17 A Not that I'm aware of. I don't
18 remember ever sharing that with anybody else.

19 Q Did Ms. REDACTED know you were married?

20 A Yes.

21 Q Did you tell Ms. REDACTED that you were
22 separated from your wife and you didn't know if
23 your marriage was going to survive?

24 A No.

25 Q What did you tell her about your

Page

1 marriage?

2 A We didn't talk about it.

3 Q Did Ms. **REDACTED** ever get pregnant?

4 A No.

5 Q How do you know?

6 A Well, I mean, she would have told me.

7 Q She never told you she got pregnant?

8 A No.

9 Q So other than Ms. **REDACTED** and
10 Ms. Delgado, did you have other affairs?

11 A Those were the two women that I dated
12 or had affairs with. There were other
13 indiscretions that I've had.

14 Q What are those indiscretions?

15 A On several occasions I've gone to a
16 massage parlor.

17 Q What massage parlor is that?

18 A It -- I don't know the names. Some
19 Asian themed -- I've gone in New York and in
20 Washington.

21 Q How many times have you been to massage
22 parlors?

23 A Probably somewhere between five or six.

24 Q And you -- you said you've gone in New
25 York and Washington?

Page

1 A Correct.

2 Q Anyone -- anywhere in Florida?

3 A I went to one in Miami.

4 Q What was the name of the massage parlor
5 in Miami?

6 A I don't remember.

7 Q Any ones in California?

8 A No.

9 Q Texas?

10 A No.

11 Q Any of the other 50 states in the
12 Union?

13 A There's D.C. and -- D.C. and Virginia,
14 the broader D.C. area.

15 Q And you know none of the names of the
16 massage parlors you attended?

17 A No. I mean, they're all -- it's not
18 something I'm particularly proud of. They're all
19 Asian themed, but I don't remember the names.

20 Q I assume when you use the word "massage
21 parlor," you refer to massage parlors that have
22 some sexual component to them; right?

23 A I've gotten a -- a hand job at a
24 massage parlor.

25 Q Okay. How many times?

Page

1 A Four or five.

2 Q Have you had blow jobs at massage
3 parlors?

4 A No.

5 Q Have you had any other sexual
6 content -- I'm sorry --

7 A No.

8 Q -- contact at massage parlors?

9 A No.

10 Q Okay. So in addition to those
11 indiscretions, what other indiscretions have
12 you -- did you -- were you referencing?

13 A And in 2015, and then, I believe, again
14 in 2017, I had sex with an escort.

15 Q And where was that?

16 A Washington, D.C.

17 Q And when in 2015?

18 A Fall of 2015.

19 Q And how about 2017? When was that?

20 A I believe it was spring.

21 Q So that's after your wife had your
22 daughter; right?

23 A Correct.

24 Q And it's after your affair with
25 A.J. Delgado?

Page

1 A Correct.

2 Q And it's after you and your wife
3 decided to try and make things work?

4 A Yes.

5 Q Have you been to a massage parlor in
6 2017 or 2018?

7 A 2018, yes.

8 Q In 2018. When was that?

9 A A couple of months ago. New York.

10 Q So a couple of months ago probably was
11 2019; right? Or did you mean 2018?

12 A I'm sorry. In the -- I don't remember
13 in -- I don't believe so in 2018. We had -- I've
14 obviously made some serious mistakes in my
15 marriage, and we had gotten things back to a
16 really good place. And, so, I -- I think for --
17 there wasn't any of that in -- I remember in 2018.
18 We got things back to a -- a good place, and --
19 and I screwed up again this spring.

20 Q Does your wife know about your having
21 sex with escorts?

22 A No.

23 Q Does your wife know about the massage
24 parlors and hand jobs?

25 A No.

Page

1 Q How do you go about finding an escort
2 to have sex with?

3 A I just Googled.

4 Q What did you Google?

5 A I don't know. Something along the
6 lines of -- I think I initially set up a -- like a
7 massage appointment and then we just went from
8 there.

9 Q How much money did you pay?

10 A I --

11 MR. VOGT: Objection. We're getting
12 way outside the scope here. I've let it go a
13 little bit, but going into these details --

14 BY MS. BOLGER:

15 Q How much money did you pay?

16 MR. VOGT: No.

17 MS. BOLGER: What's your basis for
18 stopping him from answering that question?

19 MR. VOGT: I --

20 MS. BOLGER: Particularly given that
21 you agreed with me that I could ask these
22 questions, and that's the reason I withdrew the
23 calendar from May 10th.

24 MR. VOGT: You can ask about the topic
25 areas, but --

Page

1 MS. BOLGER: Mr. Vogt --

2 MR. VOGT: This has --

3 MS. BOLGER: -- you (indiscernible) --

4 MR. VOGT: -- nothing --

5 MS. BOLGER: -- to limit --

6 MR. VOGT: -- to do --

7 MS. BOLGER: -- my questioning by what
8 you think is relevant or not limiting.

9 BY MR. VOGT:

10 Q The question is how much did you pay to
11 have sex with an escort in the spring of 2017?

12 MR. VOGT: I need to talk to him --

13 MS. BOLGER: No.

14 MR. VOGT: -- before he answers the
15 question.

16 MS. BOLGER: He can answer --

17 MR. VOGT: I can --

18 MS. BOLGER: -- my question.

19 MR. VOGT: -- talk to him before he
20 answers the --

21 MS. BOLGER: You --

22 MR. VOGT: -- the question.

23 MS. BOLGER: -- certainly cannot. You
24 can instruct him not to answer or you cannot. But
25 if you instruct him not to answer, it's going to

Page

1 be wrong, and the judge is going to give you a
2 hard time, and I'm going to file a pleading that
3 says all that, Shane. What is -- let him answer
4 the question.

5 BY MS. BOLGER:

6 Q How much money does it cost to have sex
7 with an escort in the spring of 2017?

8 A I don't recall the exact amount. I
9 think it was something like 2- or \$300, somewhere
10 in that range.

11 Q Other than the massage -- Ms. **REDACTED**
12 and the massage parlors and the having sex with
13 the escorts, what other indiscretions are there?

14 A That's everything.

15 Q Was 2015 the first time you ever had
16 sex with an escort?

17 A There was one time before I was
18 married.

19 Q And when was that?

20 A 2001.

21 Q And where was that?

22 A California.

23 Q How'd that come to pass?

24 A I was -- I don't remember exactly.
25 It's been a long time, and I've -- it's not

Page
1 something that I'm proud of or I have thought of
2 many times since then.

3 Q And were you dating your wife in 2001?

4 A No.

5 Q Does your wife know about that?

6 A No.

7 Q Were you having sex with your wife in
8 the spring of 2017 when you were having sex with
9 the escort?

10 A No.

11 Q You were having sex with **REDACTED**
12 **REDACTED**-- no, that was spring of 2016. Sorry. I
13 withdraw that.

14 Have you ever gotten anybody pregnant
15 other than Ms. Delgado and your wife?

16 A No.

17 Q How do you know that?

18 A Because they would have told me.

19 Q Have you ever asked anyone to sign a
20 nondisclosure agreement about sexual conduct --

21 A No.

22 Q -- or a personal relationship?

23 A No.

24 Q Have you ever signed such a document by
25 going to, like, a massage parlor or -- or hiring

Page

1 the -- the paid escorts?

2 A No.

3 Q You go to strip clubs?

4 A Used to.

5 Q What do you mean by "used to"?

6 A I'm trying to be a better person, and
7 that's not something that I do anymore.

8 Q But you did formerly -- formerly go to
9 strip clubs?

10 A Correct.

11 Q For what period of time of your life
12 did you go to strip clubs?

13 A I would say, like, 2000 is probably
14 the -- I mean, I probably went to one before the
15 year 2000. And then I guess the last time I've
16 been was the night in Vegas, 2016.

17 Q About how many times in those 16 years
18 when you were going to strip clubs did you go to
19 strip clubs?

20 A I don't have an exact count.

21 Q More than ten?

22 A Maybe right around that number. I
23 don't -- it wasn't something that I tracked that
24 closely. It wasn't -- it wasn't a number that I
25 was keeping track of.

Page

1 Q Did you go by yourself to strip clubs?

2 A No, I'd go with a friend.

3 Q What friend?

4 A That depends where I was at. If in --
5 to the extent that I went in Tampa or Orlando, a
6 friend of mine named Mele Ribar --

7 Q Could you spell that?

8 A Yeah. His first name is Robert; his
9 middle name is -- that he goes by is Mele,
10 M-E-L-E, and the last name Ribar, R-I-B-A-R.

11 Q Where did you meet Mr. Ribar?

12 A Met him through mutual friends in
13 Orlando.

14 Q Who were those mutual friends?

15 A Mike Miller, a former state
16 representative from the Orlando area.

17 Q Are you still friends with Mr. Ribar
18 and Mr. Miller?

19 A I haven't seen them in quite some time,
20 so I don't talk with them regularly, but they're
21 still on the Christmas card list.

22 Q I don't think I've ever had a
23 conversation that involves strip clubs and
24 Christmas cards before, Mr. Miller. I think this
25 is a first.

Page

1 You said you went to strip clubs in

2 Tampa?

3 A Correct.

4 Q What strip clubs did you go to in

5 Tampa?

6 A The Dollhouse and 2001 Space Odyssey

7 [sic] were two that I recall.

8 Q When were you going to the Dollhouse

9 and 2001 Space Odyssey?

10 A I went in 2012 and 2013.

11 Q To both of those locations?

12 A I think so.

13 Q More than once?

14 A 2012, I went twice to each. Then once

15 to each in 2013.

16 Q Did you get lap dances at the

17 Dollhouse?

18 A I don't recall.

19 Q You don't recall getting lap dances?

20 A At the Dollhouse, I don't recall.

21 Q Have you ever gotten a lap dance?

22 A Yes.

23 Q Where?

24 A 2001.

25 Q How many times did you get a lap dance?

Page

1 A I don't recall.

2 Q It seems kind of incredible to me.

3 Isn't a lap dance a reasonably memorable thing?

4 MR. VOGT: Objection to form.

5 THE WITNESS: I didn't keep track of
6 the exact number.

7 BY MS. BOLGER:

8 Q Were you drinking when you went to the
9 strip clubs?

10 A Yes.

11 Q And you said you went to strip clubs in
12 Orlando?

13 A Yes.

14 Q What strip clubs did you go to in
15 Orlando?

16 A Diamond Club.

17 Q What is Diamond Club?

18 A It's a strip bar.

19 Q And where else in Orlando?

20 A That -- I believe that was the only one
21 in this time frame that was around there. In
22 2008, I went to the -- Rachel's in Winter Park.

23 Q That's in -- my knowledge of Florida
24 geography is -- is not great. Winter Park is near
25 Orlando?

Page

1 A Correct.

2 Q Okay. And you were about to say
3 something else?

4 A Then I went to the Rachel's in Orlando,
5 I believe, in 2000. But I don't recall going back
6 after that.

7 Q Did you ever get a lap dance there?

8 A At Rachel's?

9 Q Yes.

10 A Not that I recall.

11 Q And how about the Rachel's in Winter
12 Park?

13 A Not that I recall.

14 Q How about the Diamond Club?

15 A Yes.

16 Q How many times did you go to the
17 Diamond Club?

18 A Several times, I believe, for the -- in
19 my life.

20 Q What does "several times" mean?

21 A I believe three.

22 Q What time period was that?

23 A 2012, 2013, maybe there's something in
24 the late 2000s. It's been quite a while since
25 I've -- I've been there.

1 Q Do you know the names of any of the
2 performers at the Diamond Club?

3 A No.

4 Q How about at Rachel's?

5 A No.

6 Q How about the Rachel's at Winter Park?

7 A No.

8 Q So I've got -- I count that up as five,
9 eight -- I count that up itself as more than --
10 than ten.

11 Are there other times you went to -- to
12 strip clubs?

13 A In Florida or anywhere?

14 Q In Florida.

15 A In 2008, I also went to Scarlett's
16 outside Miami.

17 Q How many times were you there?

18 A Just once.

19 Q Did you get a lap dance?

20 A Not that I recall.

21 Q Okay. Other strip clubs in Florida?

22 A I believe that's everything from -- I
23 believe that's everything for Florida.

24 Q Did you go to a strip club while you
25 were on a family vacation before?

Page

1 A No.

2 Q Other than your -- the -- the trips to
3 strip clubs in Florida that we've talked about,
4 what other -- where else did you attend strip
5 clubs?

6 A In my life?

7 Q Uh-huh.

8 A New York City.

9 Q When did you go to a strip club in New
10 York City?

11 A 2016.

12 Q What strip club?

13 A Flash Dancers.

14 Q Who did you go to that with?

15 A Kaelan Dorr.

16 Q How many times have you been to
17 FlashDancers?

18 A I believe it was once in 2016 and I had
19 gone, I think, maybe in 1997 or '98.

20 Q Did you get lap dances any of those
21 times?

22 A I don't recall. I don't believe so.

23 Q Okay. Other than those strip clubs in
24 Florida and New York City -- was that it for New
25 York City?

Page

1 answer to that.

2 You just testified that you had sex
3 with an escort in the spring of 2017. Other
4 than -- is that the last time you have been
5 unfaithful to your wife?

6 A Other than the massage parlor trip,
7 yes.

8 Q And -- okay.

9 Did you at any of these places have a
10 relationship with any of the strippers?

11 A No.

12 Q Did you have sex with any of the
13 strippers?

14 A No.

15 Q At no point, not from 2000 to 2016, did
16 you have sex with any of the strippers?

17 A No, I've never had a relationship with
18 someone I've met at a strip club whether it be a
19 stripper or another attendee or anything of the
20 sort.

21 Q You may be using the word
22 "relationship" differently.

23 Have you gotten a hand job from a
24 stripper?

25 A No.

Page

1 Q Have you had a blow job from a
2 stripper?

3 A No.

4 Q But you have had lap dances from a
5 stripper?

6 A Correct.

7 Q How many times do you think you've had
8 a lap dance?

9 A I don't know the exact number.

10 Q Does your wife know about all of these
11 attendances at strip clubs?

12 A Most of them.

13 Q What does she think about it?

14 MR. VOGT: Objection.

15 Don't answer to the extent it calls for
16 you to reveal privileged communications with your
17 wife, respectfully.

18 MS. BOLGER: Because you know I
19 disagree with the objection.

20 BY MS. BOLGER:

21 Q What are you -- are you going to answer
22 or can you answer that question without not taking
23 Mr. Vogt's advice?

24 A I'll follow the advice of counsel.

25 Q When did you first believe that

Page

1 clients --

2 MS. BOLGER: He is --

3 MR. VOGT: -- did.

4 MS. BOLGER: -- spinning. That's what
5 Mr. Miller does --

6 MR. VOGT: He's --

7 MS. BOLGER: -- for a --

8 MR. VOGT: -- given you --

9 MS. BOLGER: -- living.

10 MR. VOGT: -- an answer.

11 BY MS. BOLGER:

12 Q Can you look at Exhibit 12, please,
13 which is the tweets?

14 MS. BOLGER: Can you put the sticker
15 on?

16 BY MS. BOLGER:

17 Q Can you please look at Exhibit 12?
18 (J. Miller Deposition Exhibit 12 was
19 marked for identification and attached to the
20 transcript.)

21 BY MS. BOLGER:

22 Q All right. Here's Exhibit 12. This is
23 a series of three tweets. The first one is from
24 Mr. Ali dated September 22nd. Jason is referring
25 to me in this tweet. I have not disproven such

Page
1 claims and to say so is inaccurate. The only way
2 to disprove such a claim is to definitely prove
3 that Jason was not in the state of Florida during
4 that time period.

5 Then you flip to the next page, which
6 is tweet two, he says, it -- it is, indeed,
7 accurate that I spoke to two women in Florida who
8 made claims similar to the ones listed in
9 Ms. Delgado's filing.

10 Do you see that, Mr. Miller?

11 A Yes.

12 Q Do you believe that the phrase "it is
13 indeed accurate that Mr. Ali spoke to two women in
14 Florida who made claims similar to the ones listed
15 in Ms. Delgado's filing" is false?

16 A I think the impression that Ali is
17 trying to give here is that he spoke with
18 two . . .

19 Q Two women in Florida?

20 A Two women in Florida that I physically
21 harmed or injured when in reality we know that
22 Jane Doe denied the story or knowing me or
23 anything, and I would suspect that the two women
24 that he spoke with were A.J. Delgado and her
25 sister Alina.

Page

1 no pending question, Mr. Miller, so you may not
2 speak.

3 My current pending question is it's --
4 the third tweet says, To be clear, for the people
5 who have asked me, the two women I spoke to in
6 Florida made these abuse claims against Mr. Miller
7 which he denied to me directly.

8 Do you see that?

9 A Yes, and when --

10 Q Okay. And do those two women -- do
11 you, again, think that those two women are a
12 reference to Ms. Delgado and her sister?

13 A Yes, because --

14 Q Okay.

15 A -- Mr. Ali --

16 Q Thank you.

17 A -- told --

18 Q That's great.

19 A As we know --

20 Q All I --

21 A -- Jane --

22 Q -- want to --

23 A -- Doe --

24 Q Mr. Miller --

25 A -- denied the story and Yashar Ali

Page

1 never spoke with a Clearwater woman.

2 Q So how do you --

3 A He's doing -- he did --

4 Q How did you come to discover that the
5 supplement had been filed?

6 A I believe my attorney called or -- from
7 counsel.

8 MR. VOGT: Just -- just say counsel.

9 THE WITNESS: Counsel.

10 BY MS. BOLGER:

11 Q Which counsel?

12 A Family law counsel.

13 Q Okay. When did you -- like, when in
14 the day, did you find out?

15 A I don't remember the exact time. I was
16 on a plane getting ready to take off, so I
17 don't -- I don't remember exactly.

18 Q Plane in the evening or plane in the
19 morning?

20 A I don't remember exactly.

21 Q Okay. And what was the first thing you
22 did in response to the news that the supplement
23 was filed?

24 A My counsel was already acting on it,
25 and so there wasn't anything for me to

Page

1 started, Shane. So don't tell --

2 MR. VOGT: Come on, Kate.

3 MS. BOLGER: Don't tell fibs.

4 MR. VOGT: Come on, Kate.

5 (J. Miller Deposition Exhibit 13 was
6 marked for identification and attached to the
7 transcript.)

8 BY MS. BOLGER:

9 Q Okay. Mr. Miller, this is a document
10 we obtained from Scores that shows a picture of a
11 woman who goes by the name **REDACTED**.

12 Do you see that?

13 A Yes.

14 Q Is that -- is that the **REDACTED**
15 that you all found and got the affidavit from?

16 A It looks pretty similar to the pictures
17 I've previously seen.

18 Q Do you -- do you know if this is her or
19 not?

20 A I've never personally met or spoken
21 with Ms. **REDACTED** but I know that she had been a
22 dancer or still is or at one point -- and this
23 does look like the woman in the photos that Yashar
24 Ali sent -- sent to me.

25 Q Okay.

Page

1 there was a reference to -- Splinter was a
2 referenced in here and you can see what my
3 response was.

4 Q No, no, it's fine. I was just wondered
5 if I was missing some context from it. So I thank
6 you for clarifying that.

7 A I was trying to make sure I presented
8 everything that I had.

9 MS. BOLGER: Okay. We can take a
10 break.

11 THE VIDEOGRAPHER: We are going off the
12 record at 5:31 p.m. This ends disk number 4.

13 (Recess -- 5:31 p.m.)

14 (After recess -- 5:50 p.m.)

15 THE VIDEOGRAPHER: We are back on the
16 record at 5:50 p.m. This begins disk number 5.

17 BY MS. BOLGER:

18 Q Mr. Miller, why didn't you sue
19 A.J. Delgado for defamation?

20 A That -- I'd be talking about a
21 privileged communication, I believe.

22 Q Well, I mean, I was actually asking for
23 your mental impressions. If -- if you've had no
24 mental impressions related to this, unrelated to a
25 conversation with your attorney, I guess it's

Page

1 privileged.

2 But I'm asking your thoughts. I'm not
3 asking your attorneys' thoughts.

4 MR. VOGT: Yeah, so if you can't answer
5 that question without revealing the substance of
6 communications with counsel, then you should not
7 answer it.

8 THE WITNESS: I believe I'd have to
9 reveal privileged communications to give a
10 complete answer.

11 BY MS. BOLGER:

12 Q Could you give me a partial answer
13 without revealing communications?

14 A I don't think that would be appropriate
15 to give you a half answer on something so I --

16 Q You have to -- you have to tell me
17 about nonprivileged information. It's not -- you
18 don't get to determine that. That's just the
19 rules, Mr. Miller. I don't make them.

20 But my point is is there a
21 nonprivileged reason you can give me why you
22 didn't sue A.J. Delgado?

23 MR. VOGT: Objection to form.

24 But you can answer to the extent it
25 does not call for you to reveal privileged

Page

1 information.

2 MS. BOLGER: Which it explicitly does
3 not do.

4 THE WITNESS: I would essentially be
5 suing myself if I sued Ms. Delgado.

6 BY MS. BOLGER:

7 Q I don't understand that. Why is that?

8 A Because I'm the sole bread winner for
9 her household, and I would -- any costs or
10 anything incurred in that, I'd ultimately just be
11 suing myself.

12 Q Is there any reason why you haven't
13 sued Yashar Ali?

14 MR. VOGT: And same objection.

15 And instruct you not to answer to the
16 extent that's based on communications between you
17 and counsel.

18 THE WITNESS: That would definitely
19 fall into the conversations with counsel.

20 BY MS. BOLGER:

21 Q And no independent thinking on that
22 one?

23 A It would definitely fall into the
24 conversations with counsel.

25 Q And I want to talk to you about CNN.

Page

1 So you were on CNN for a comment -- as
2 a commentator for a period of time, and you were
3 there largely to give the point of view of the
4 presidential candidate Trump, President-elect
5 Trump -- and then -- presidential candidate Trump
6 and then President-elect Trump; is that right?

7 A I was on as a supporter of the
8 president's and someone who's familiar with --
9 familiar with his thinking and his team's
10 thinking, yes.

11 Q Okay. You have a nondisclosure
12 agreement with the Trump campaign; correct?

13 A Yes, there's an NDA that both myself
14 and Ms. Delgado and everyone else who worked on
15 the campaign signed.

16 Q Okay. And you signed that
17 nondisclosure agreement. It also has a
18 nondisparagement clause; correct?

19 A It does.

20 Q Okay. And what does that clause
21 prohibit you from doing?

22 A I haven't read the exact language in a
23 while, but --

24 MR. VOGT: Don't guess. If you don't
25 know, you don't know.

Page

1 it.

2 And people ask, like, you know, is it
3 true; did you know this woman; did you ever get to
4 bottom of it or find out what happened. And, so,
5 it's this big lingering cloud and it's just -- I
6 don't understand why you guys won't take the story
7 down.

8 Q So somewhere I read -- and I confess I
9 cannot remember where -- that Ms. Delgado made
10 some effort to interfere with your relationship to
11 CNN -- with CNN not related to the story.

12 Is that -- is that accurate?

13 MR. VOGT: Objection to form.

14 MS. BOLGER: You're right. The
15 question was bad, and I'm sorry. The problem is I
16 know I read this in preparing for his deposition
17 but I can't pinpoint in my mind exactly where it
18 was.

19 BY MS. BOLGER:

20 Q I'll just ask you this question. Did
21 Ms. Delgado ever attempt to interfere in your
22 relationship with CNN apart from the supplement or
23 the story contained therein?

24 A Yes.

25 Q Can you tell me about that?

Page

1 A She would tweet at Jeff Zucker
2 attacking him and others as well as various
3 hosts -- show hosts asking why they were having me
4 on, and -- and then she was routinely attacking me
5 on social media regarding the NDA issue and saying
6 when is CNN going to dump Jason Miller because of
7 the NDA issue which, by the way, nobody left CNN
8 because of the NDA issue.

9 And, in fact, Christie Johnson who is
10 one of my -- she was one of the two people who
11 really helped me get in the door in the first
12 place at CNN -- was Christie Johnson and Sam
13 Feist. Christy told me that the NDA thing was
14 basically all puffery, that nobody's status was at
15 all in danger and that nothing would ever happen.
16 They just feel like they have to go and say on the
17 air that -- that we had signed it just to cover
18 their -- cover their rear ends.

19 Q Did you -- are you friends with Sam
20 Feist?

21 A Yes.

22 Q And that relationship is longstanding;
23 right?

24 A I've known him for a decade, yes.

25 Q How many followers do you have on

Page
1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Dana C. Ryan, Registered Professional
3 Reporter, Certified Realtime Reporter, the officer
4 before whom the foregoing proceedings were taken
5 do hereby certify that the foregoing transcript is
6 a true and correct record to the best of my
7 ability of the proceedings; that said proceedings
8 were taken by me stenographically and thereafter
9 reduced to typewriting under my supervision; and
10 that I am neither counsel for, related to, nor
11 employed by any of the parties to this case and
12 have no interest, financial or otherwise, in its
13 outcome.

14 IN WITNESS WHEREOF, I have hereunto set
15 my hand and affixed my notarial seal this 4th day
16 of June 2019.

17 My Commission expires:

18 July 15, 2020
19

20 
21
22

23 NOTARY PUBLIC IN AND FOR THE
24 DISTRICT OF COLUMBIA
25